



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 8**

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**MAY 29 2014'**

Ref: 8EPR-N

Mary Erickson, Forest Supervisor  
Custer - Gallatin National Forests  
P.O. Box 130  
Bozeman, MT 59771

Re: Greater Red Lodge Habitat and Vegetation  
Management Project Draft Environmental Impact  
Statement, CEQ # 20140122

Dear Ms. Erickson:

The U.S. Environmental Protection Agency Region 8 has reviewed the Draft Environmental Impact Statement (EIS) for the Greater Red Lodge Habitat and Vegetation Management Project, prepared by the USDA Forest Service (USFS). Our comments are provided for your consideration pursuant to our responsibilities and authority under Section 102(2)(C) of the National Environmental Policy Act (NEPA). Section 309 of the Clean Air Act directs the EPA to review and comment in writing on the environmental impacts of any major federal agency action. As provided in more detail at the end of the letter, our review has resulted in a rating of EC-1 (Environmental Concerns – Adequate Information).

**Project Background**

The Custer National Forest, Beartooth Ranger District is proposing the Greater Red Lodge Habitat and Vegetation Management Project to reduce hazardous fuels in the wildland urban interface near the City of Red Lodge and community of Luther, MT; maintain/improve resiliency of forest vegetation and grasslands; enhance aspen habitat; and improve water quality. This Draft EIS evaluates the impacts of a No Action Alternative and three action alternatives that consider vegetation and fuels management on approximately 1000 – 2000 acres depending upon the alternative, as well as reconstruction of Nichols Creek Road and about 4 miles of road decommissioning to improve water quality.

**Comments and Recommendations**

We commend the USFS for the consideration of multiple alternatives and thorough evaluation of current conditions and potential impacts. Our concerns focus on two areas: water and air quality.

### Water Quality

There are three streams within the project area that are listed as impaired for sedimentation/siltation. Two of the streams are within the Red Lodge Creek project area and the other stream is within the Willow/Nichols Creek project area. The Draft EIS explains that there will be long term water quality improvement for numerous streams within the project area. All the action alternatives will have short-term negative impacts from sedimentation to streams, including the three waters that are already impaired. The Draft EIS also states that the sediment yield is expected to increase as much as 20 percent above the existing levels in subwatersheds. In combination with state management activities, the sedimentation rate in some streams may increase by even greater percentages. We encourage the USFS assure implementation of the many mitigating measures and best management practices (BMPs) described in the Draft EIS that will help to minimize these short-term impacts. Additionally, we recommend including a map in the Final EIS that clearly delineates the impaired stream locations.

### Air Quality

The proposed project includes the application of prescribed burns, including broadcast burns and pile burning. Prescribed burns will increase PM 2.5 in the project vicinity. We understand that implementation of mitigation measures and coordination with the Montana/Idaho State Airshed Group will help to minimize potential air quality issues. We want to emphasize that the implementation of the project conditions as described in the Draft EIS are important to limit the air quality impacts to within 0.6 miles. In addition, notifying the public prior to the plan burns, as described in the Draft EIS, is an important part of ensuring public health protection.

### **Rating**

Consistent with Section 309 of the CAA, it is the EPA's responsibility to provide an independent review and evaluation of the potential environmental impacts of this project. Based on the procedures the EPA uses to evaluate the adequacy of the information and the potential environmental impacts of the proposed action, the EPA is rating this Draft EIS as Environmental Concerns – Adequate Information, (EC-1). The "EC" rating indicates that the EPA review has identified environmental impacts that need to be avoided in order to fully protect the environment. The "1" rating indicates that the EPA believes the Draft EIS provides adequate information and analyses to disclose project impacts. A full description of the EPA's rating system can be found at: <http://www.epa.gov/compliance/nepa/comments/ratings/html>.

We support the USFS commitment to protect natural resources. If you have any questions or would like to discuss our concerns in more detail, please contact me at (303) 312-6704. You may also contact Lisa Lloyd, NEPA lead reviewer, at (303) 312-6537 or by email at [lloyd.lisa@epa.gov](mailto:lloyd.lisa@epa.gov).

Sincerely,



for

Philip S. Strobel  
Acting Director, NEPA Compliance and Review Program  
Office of Ecosystems Protection and Remediation

cc: Amy Waring, USFS